



January 31, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

**Re: PTI Quarterly Report
CC Docket No. 94-102**

Dear Ms. Dortch,

This report is submitted on behalf of PTI Pacifica, Inc. ("PTI"), formerly known as GTE Pacifica, Inc. the wireline-side cellular licensee for the Commonwealth of the Northern Marianas Islands ("CNMI"). The CNMI, a self-governing Commonwealth in political union with and under the sovereignty of the United States of America, is a three hundred mile archipelago consisting of fourteen islands, the largest inhabited islands of which are Saipan, Rota and Tinian. The CNMI is located approximately 150 miles north of Guam in the Micronesia area of the eastern Pacific Ocean, over 5,000 miles from the mainland U.S. PTI provides wireless service principally via CDMA 1x technology, which it has generally overlaid coextensive with the coverage of its legacy TDMA and analog platforms. PTI began GSM operations on Saipan in mid-June 2007.

Handset manufacturers currently do not offer location-capable GSM handsets to wireless carriers. In an electronic filing in this docket on July 6, 2007, PTI notified the Commission pursuant to Section 20.18(i) of the rules that it intends to employ a network-based E911 solution for its GSM network in response to any valid PSAP request; and in a February 1, 2007 filing PTI notified the Commission that remaining TDMA customers will become subject to the network-based solution.

BACKGROUND

On March 29, 2006, the Commission granted PTI's request for an extension of time until June 30, 2007, to comply with the requirement in Section 20.18(g)(i)(v) of the Commission's rules that carriers employing a handset-based E911 Phase II location technology must achieve 95 percent penetration among their subscribers of location-capable handsets. *See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems – GTE Pacifica, Inc. d/b/a Verizon Pacifica Request for Waiver*, CC Docket No. 94-102, FCC 06-40 (rel. Mar 29, 2006). In order to monitor compliance with the relief granted, the Commission required PTI to file status reports quarterly beginning May 1, 2006, and ending June 30, 2008. *Id.* at paragraph 19.

1). The Number and Status of Phase II requests from PSAPs.

The CNMI Department of Public Safety ("DPS") is the single entity charged with implementing the E911 system. Its jurisdiction covers all three populated CNMI islands, Saipan, Tinian and Rota. To date PTI has not received any CNMI government agency or PSAP request for E911 Phase I or II.

2). The dates on which Phase II service will be available to PSAPs served by PTI's network.

PTI has been in contact with CNMI officials and understands that CNMI deployment of E911 is not imminent. We plan to work in parallel with the CNMI - DPS and assist them with the implementation of the E911 system when its E911 funding becomes available. We will periodically hold meetings with CNMI-DPS to track progress.

3). The status of PTI's coordination efforts with PSAPs for alternative 95% handset penetration dates.

We will continue our ongoing E911 dialogue with the responsible CNMI officials to ensure steps are being taken to address the relevant issues. As noted above, it does not appear that a PSAP request for either Phase I or Phase II E911 service is imminent.

4). PTI's efforts to encourage customers to upgrade to location capable handsets.

All CDMA handsets sold by PTI since the deployment of its CDMA network have been compatible with automatic location identification ("ALI") technology.

As described above, manufacturers do not sell GSM handsets that are location-capable. The GSM and remaining legacy TDMA handsets will be subject to a network-based E911 solution once a valid PSAP request is made.

5). The percentage of PTI customers with location-capable handsets.

The percentage of PTI handsets subject to Section 20.18(g)(i)(v) of the Commission's rules that are location-capable is 99% as of the date of this report.

6). Detailed information on PTI's status in achieving compliance and whether it is on schedule to meet the revised deadline.

As described in the preceding section, PTI is compliant with the revised deadline as 99% of the handsets subject to Section 20.18(g)(i)(v) of the Commission's rules are location capable.

Respectfully submitted,



/s/

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